

FILED

OCT - 5 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL GLADIEUX and
ANTHONY GLADIEUX,

Defendants.

No.

4:17CR00449 HEA

INFORMATION

The United States Attorney charges that:

A. INTRODUCTION

At all times relevant to this Information:

1. United Adventures (UA) was a company registered in the State of Florida by Anthony Gladieux. United Adventures was operated by Paul Gladieux, Anthony Gladieux, Josh Henderson and others. UA Enterprise, LLC (UAE) was a company registered in the State of Missouri by E.K. as an associate company of UA. UA and UAE were operated as telemarketing companies as that term is defined by Title 18, United States Code, Section 2325.

2. A “call center” is a place from which telemarketers make telephone calls to prospective clients.

3. “Lead lists” consist of names, addresses and telephone numbers of prospective clients.

4. “Pitch sheets” are scripts which tout the promotion of the goods or services provided by the telemarketing company and are designed to be read over the telephone to the prospective clients.

B. THE CONSPIRACY

5. From on or about June 6, 2012 until May 1, 2015, in the Eastern District of Missouri, and elsewhere,

**PAUL GLADIEUX and
ANTHONY GLADIEUX,**

the Defendants herein, together with those known, including Henderson, E.M., and E.K., and those unknown, did knowingly and willfully agree and conspire to commit the following offenses against the United States:

a. Mail Fraud, that is, devising a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises and in executing and attempting to execute said scheme, caused to be delivered by the United States Postal Service certain matter and things, in violation of Title 18, United States Code, Section 1341; and

b. Wire Fraud, that is, devising a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and in executing and attempting to execute said scheme, caused writings, signs, signals, and sounds to be transmitted by means of wire in interstate commerce, in violation of Title 18, United States Code, Section 1343.

C. MANNER AND MEANS

6. The means and methods by which the conspiracy was sought to be accomplished included, among others, the following:

a. Defendants and their co-conspirators falsely represented that UA and UAE were in the business of selling or renting timeshare properties. These false representations were made over the telephone and on various website(s).

b. Defendants and their co-conspirators targeted residents across the United States by obtaining names of individuals (victims) who owned timeshare properties. Victims were identified by obtaining unauthorized lead lists from legitimate timeshare companies.

c. Defendants and their co-conspirators, using a UAE call center in the Eastern District of Missouri, contacted the victims, and using pitch sheets and variations thereof, telemarketed UA's non-existent services. Victims were induced to give credit card numbers over the telephone which were then charged through a UA merchant account for fees or escrow for the proffered, but actually non-existent, services.

d. Defendants and their co-conspirators created fraudulent business agreements promising to find renters when in fact no effort was made to obtain a buyer/renter and no such individual existed.

e. UA and UAE made no attempt to perform the services contracted by the victims. Defendants and their co-conspirators simply retained the victim's money, paid ostensibly as an escrow or fees, and distributed it among themselves.

D. OVERT ACTS

7. In furtherance of the conspiracy and to effect the objects of the conspiracy, defendant and his co-conspirators committed and caused the following overt acts:

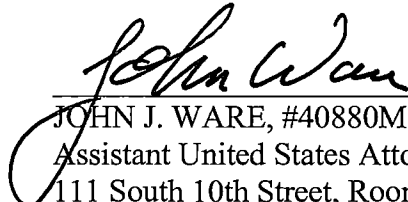
a. On or about June 6, 2012, Defendant Paul Gladieux opened an account at Line 2 to be used for United Adventures.

- b. On or about August 22, 2012, Defendant Paul Gladieux registered United Adventures as a business with the Florida Secretary of State.
- c. On or about August 24, 2012, Defendant Anthony Gladieux opened an account at Sun Trust Bank in the name of United Adventures along with a merchant account in order to process credit and payments online.
- d. On or about September 6, 2012, Defendant Anthony Gladieux created a website for United Adventures which contained several false or misleading statements concerning the business, including advertising services that actually were non-existent.
- e. On or about November 18-24, 2012, Defendants Paul and Anthony Gladieux traveled from Florida to St. Louis, Missouri to meet with Henderson.
- f. On or about November 18-24, 2012, Defendants Paul and Anthony Gladieux and Henderson met with, and recruited, E.M. to run a call center in St. Louis for United Adventures.
- g. On or about April 5, 2013, E.K., recruited by E.M. to participate in the scheme, leased office space in St. Louis County for a United Adventures' call center.
- h. On or about May 30, 2013, S.G., a United Adventures employee at the St. Louis location, solicited victim M.W.-W. in a telephone call to pay \$995 in exchange for a promise to rent the timeshare owned by M.W.-W. for a substantial profit.
- i. On or about May 30, 2013, Defendant Anthony Gladieux emailed M.W.-W. a contract to memorialize the telephone solicitation made by S.G.
- j. On or about May 30, 2013, Defendant Paul Gladieux, using the United Adventures merchant account, processed a \$995 charge on M.W.-W.'s credit card.

All in violation of, and punishable under, Title 18, United States Code, Section 371.

Respectfully submitted,

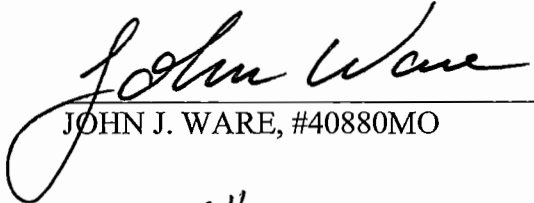
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UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, John J. Ware, Assistant United States Attorney for the Eastern District of Missouri, being
duly sworn, do say that the foregoing information is true as I verily believe.


JOHN J. WARE, #40880MO

Subscribed and sworn to before me this 6th day of September, 2017


CLERK U.S. DISTRICT COURT

By: 
DEPUTY CLERK